## UNITED STATES BANKRUPTCY COURT DISTRICT OF PUERTO RICO

IN RE:

ENRIQUE RODRÍGUEZ NARVÁEZ MYRNA I. RIVERA ORTIZ

**DEBTORS** 

**CASE NO. 18-02044-EAG** 

**CHAPTER 11** 

## MOTION TO REQUEST SHORTENING OF RESPONSE PERIOD FOR MOTION TO MAKE SALE

## TO THE HONORABLE COURT:

**COMES NOW** Debtors through the undersigned attorney and respectfully request and pray for the following:

- 1. On April 16, 2018, Debtors, Enrique Rodríguez Narváez & Myrna I. Rivera Ortiz, filed a voluntary petition for relief pursuant chapter 11 of the Bankruptcy Code. This case has a confirmed plan which contemplate the payments of the creditors by the sale or development of the property.
  - 2. On August 17, 2021, Debtors filed a Motion to Make Sale. See, Docket no. 209.
- 3. Debtors request the reduction of the response period of the Motion to Make Sale at Docket no. 209 pursuant to Rule 2002(a)(2) of the Federal Rules of Bankruptcy Procedure since with this sale Debtors will be able to pay their creditors and also, to retain the buyer.
- 4. Therefore, Debtors request the Court to shorten the response period to fourteen (14) days for parties in interest to object or express themselves with respect to the Motion to Make Sale.

WHEREFORE, Debtors respectfully request this Court to approve the Motion to Make Sale with a reduced response period of fourteen (14) days from today's date for parties in interest to file an objection to the same.

**CERTIFICATE OF SERVICE** We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems which will send notification of such filing to the US Trustee and all CM/ECF participants.

In Caguas, Puerto Rico, this 17 day of August of 2021.

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